

FILED
Clerk
District Court

AUG 10 2007

UNITED STATES DISTRICT COURT
For The Northern Mariana Islands
By _____
(Deputy Clerk)
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUN, WEI QIN,

Defendant.

Criminal Case No. **CR 07-00024**

S U P E R S E D I N G I N D I C T M E N T

Title 18, U.S.C. § 371 - Conspiracy (Ct. 1);
Title 18, U.S.C., §§ 2422, 2 - Coercion and
Enticement for Prostitution (Ct. 2);
Title 18, U.S.C., §§ 2314, 2 - Foreign
Transportation of Persons in Execution of
Fraud Scheme (Ct. 3).

THE GRAND JURY CHARGES:

COUNT ONE

CONSPIRACY TO COMMIT FOREIGN TRANSPORTATION FOR
PROSTITUTION, AND FOREIGN TRANSPORTATION
OF A PERSON IN EXECUTION OF A FRAUD SCHEME

Introductory Allegations

1. At all times relevant to this Superseding Indictment, SUN, WEI QIN, the defendant, served as manager and operator of Phoenix Corporation, d/b/a "Phoenix Karaoke", a nightclub in Saipan, Northern Mariana Islands, which was operating as a commercial sex house.

2. At all times relevant to this Superseding Indictment, SUN, WEI QIN, the defendant, was a Chinese national, present in the C.N.M.I. pursuant to a pending renewal of a non-resident ("706K") work permit.

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3 3. At all times relevant to this Superseding Indictment, Leung Min Hu, an unindicted co-
4 conspirator, was the secretary and authorized representative for Saite Communication Development
5 Corp, a business registered in the Northern Mariana Islands.

6 4. At all times relevant to this Superseding Indictment, Leung Min Hu was a Chinese
7 national, present in the C.N.M.I. pursuant to an Immediate Relative entry permit.

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9 5. At all times relevant to this Superseding Indictment, Lin Xiu Lan was a Chinese
10 national who was persuaded, enticed and induced to travel in foreign transportation for the purpose
11 of engaging in prostitution.

12 6. At all times relevant to this Superseding Indictment, Lin Xiu Lan was a Chinese
13 national who was induced to travel in foreign transportation in furtherance of a scheme to perpetrate
14 a fraud.

15 The Scheme

16 7. Beginning in or about December 2005, or sometime thereafter, the defendant, SUN,
17 WEI QIN, together with individuals known and unknown, operated Phoenix Karaoke as an illegal
18 commercial sex house in the District of the Northern Mariana Islands, on the island of Saipan.

19 8. Beginning or about October 2006, the defendant, SUN, WEI QIN, knowingly devised
20 and perpetrated a scheme to defraud Lin Xiu Lan, by knowingly and wilfully making false
21 representations and promises, to wit, by asking Lin Xiu Lan to pay the defendant approximately
22 \$4,500 in recruitment and other fees, in addition to travel and other expenses totaling more than
23 \$5,000, in return for lawful employment in the District of the Northern Mariana Islands, on the island
24 of Saipan.
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2 9. Beginning or about October 2006, the defendant, SUN, WEI QIN, knowingly and
3 fraudulently made false representations to Lin Xiu Lan, thereby persuading, inducing, and enticing
4 her to travel to the District of the Northern Mariana Islands. Such misrepresentations include, but are
5 not limited to: (a) a promise that Lin Xiu Lan would be working as a waitress; (b) that Lin Xiu Lan
6 would be employed by a company owned by SUN, WEI QIN; (c) that Lin Xiu Lan would earn at
7 least \$700 per month; and (d) that Lin Xiu Lan's employment would be legal.

8 10. Beginning or about October 2006, the defendant, SUN, WEI QIN, agreed with Leung
9 Min Hu, to have Saite Communication Development Corp hire Lin Xiu Lan as an employee, and
10 specifically as a "commercial cleaner", knowing and intending that Lin Xiu Lan would not be
11 working for said company as a commercial cleaner, but would, instead, be working for Phoenix
12 Karaoke as a prostitute.

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14 The Conspiracy

15 11. Beginning on or about October 2006, continuing to in on or about May 2007, in the
16 District of the Northern Mariana Islands and elsewhere, the defendant, SUN, WEI QIN, and Leung
17 Min Hu, together with other persons known and unknown, unlawfully, willfully and knowingly, did
18 combine, conspire, confederate and agree, to commit offenses against the United States, to wit, to
19 commit Foreign Transportation for Prostitution, in violation of Title 18, United States Code, Sections
20 2422 and 2, and Foreign Transportation of persons in execution and furtherance of a scheme to
21 defraud, in violation of Title 18, United States Code, Sections 2314 and 2.

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23 Overt Acts

24 12. On or about December 14, 2006, unindicted co-conspirator Leung Min Hu did file
25 with the Department of Labor of the Commonwealth of the Northern Mariana Islands, an application
26 to employ Lin Xiu Lan as a commercial cleaner at Saite Communication Development Corp.
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4 13. On or about March 2, 2007, defendant SUN, WEI QIN, transported Lin Xiu Lan from
5 the Saipan International Airport to Phoenix Karaoke, in the District of the Northern Mariana Islands,
6 on the island of Saipan, in furtherance of the scheme to defraud Lin Xiu Lan, and in furtherance of a
7 scheme to transport a person for the purpose of prostitution,

8 (Title 18, United States Code, Section 371).
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13 THE GRAND JURY FURTHER CHARGES:

14 COUNT TWO
15 FOREIGN TRANSPORTATION FOR PROSTITUTION
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17 14. On or about March 2, 2007, in the District of the Northern Mariana Islands and
18 elsewhere, SUN, WEI QIN, the defendant knowingly persuaded, induced, enticed, or coerced an
19 individual, to wit, Lin, Xiu Lan, to travel in interstate and foreign commerce, and in any Territory and
20 Possession of the United States, with the intent that such individual engage in prostitution and in
21 sexual activity which would constitute a criminal offense under 6 N. Mar. I. Code §§ 1342 and 1343,

22 (Title 18, United States Code, Sections 2422 and 2).
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1 THE GRAND JURY FURTHER CHARGES:

2 COUNT THREE

3 FOREIGN TRANSPORTATION OF PERSON IN EXECUTION OF FRAUD SCHEME

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5 15. On or about March 2, 2007, in the District of the Northern Mariana Islands and
6 elsewhere, SUN, WEI QIN, the defendant, unlawfully, knowingly and wilfully, having devised and
7 intending to devise a scheme and artifice to defraud and for obtaining money by means of materially
8 false and fraudulent pretenses, representations and promises, transported and caused to be
9 transported, and induced Lin, Xiu Lan, to travel in, and be transported in, interstate and foreign
10 commerce in the execution and concealment of a scheme and artifice to defraud such person of
11 money and property having a value of \$5,000 and more,

12 (Title 18, United States Code, Sections 2314 and 2).

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14 Dated this 10th day of August 2007

15 A TRUE BILL.

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18 _____
19 Foreperson

20 LEONARDO M. RAPADAS
21 United States Attorney
22 Districts of Guam and CNMI

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24 By:

25 
26 ERIC S. O'MALLEY
27 Assistant United States Attorney
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